



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 24, 2022

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 443  
New York, New York 10007

**Re: United States v. Gomez and Younes Arboleda, 18 Cr. 262 (VEC)**

Dear Judge Caproni:

The Government writes in response to the Court's January 21, 2022 Order. (Dkt. 98). After consulting with the Assistant Warden at the facility at which the defendants are currently housed, neither the facility nor the Government has an objection to the defendants having access to an air-gapped laptop at the facility to review discovery. In addition to the conditions contained in the proposed order, the Government will confirm with defense counsel that the defendants understand and will abide by the terms of the Protective Order in this matter. (Dkts. 36, 60).

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Jason A. Richman  
Jason A. Richman  
Benjamin Woodside Schrier  
Kyle Wirshba  
Assistant United States Attorneys  
(212) 637-1062 / 2589 / 2493

cc: Defense counsel (by ECF)